

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
AHRON BRAUN,

Plaintiff,

-against-

CLIENT SERVICES, INC.,

Defendant.
-----X

Case No. 12 Civ. 5256 (KMK)

**NOTICE OF
MOTION TO DISMISS**

PLEASE TAKE NOTICE, that upon the pleadings, the Declaration of Gregory R. Saracino, Esq. with all exhibits annexed thereto, and the Memorandum of Law, the defendant CLIENT SERVICES, INC. will move this Court before Hon. Kenneth M. Karas, United States District Judge, located at Courthouse at 300 Quarropas Street, White Plains, New York, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing the Amended Complaint in its entirety with prejudice for failure to state a claim upon which relief can be granted, and granting such other and further relief as this Court may deem just and proper.

Answering papers, if any, shall be served in accordance with the Court's mandates.

Dated: White Plains, New York
April 1, 2013

Respectfully submitted,

**MILBER MAKRIS PLOUSADIS
& SEIDEN, LLP**



By: _____

Gregory R. Saracino (GS-1020)
Attorneys for Defendant
CLIENT SERVICES, INC.
3 Barker Avenue, 6th Floor
White Plains, New York 10601
(914) 681-8700
gsaracino@milbermakris.com

To: Ahron Braun
Pro Se Plaintiff
4 Mountain Road Unit 205
Monroe, NY 10950